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Superfund Records Center

SITE: Wells G&H
BREAK: 11.9
OTHER: 995541

Curt M. Richards
Corporate Vice President,
Environment, Health & Safety

CERTIFIED LETTER

July 1, 2014

Mr. Joseph LeMay
Remedial Project Manager
U.S. EPA Region 1
5 Post Office Square, Suite 100, OSRR07-4
Boston, MA 02109-3912

Subject: Olin Response to Notice of Potential Liability at the Southwest Properties
Portion of Operable Unit Two of the Wells G&H Superfund Site Woburn, MA

Dear Mr. LeMay:

This letter provides Olin Corporation's (Olin's) response to your letter dated June 2, 2014 regarding USEPA's assertion that Olin has potential liability for the Southwest Properties portion of Operable Unit 2 of the Wells G&H Superfund Site in Woburn, MA (the Site).

Based on a thorough review of the information you provided in its entirety and a thorough review of Olin's records, Olin has identified no evidence of potential responsibility for past, present, or future environmental conditions at the Site. The information USEPA provided to Olin indicates that nearly all of Olin's past dealings with E. C. Whitney (aka Whitney Barrel Co.) was at the Whitney Barrel Woburn Street facility in Wilmington, Massachusetts, and not the Salem Street location associated with the Wells G&H Superfund Site. Olin informed USEPA in its March 15, 2004 Section 104(e) information request response that Olin purchased two 55-gallon drums in a single transaction with the Salem Street facility. There is no evidence or information that Olin arranged for the disposal of hazardous substances at the Site.

It should also be noted that Olin Corporation purchased the 51 Eames Street, Wilmington, Massachusetts property in 1980 from Stepan Chemical Company (now known as Stepan Company). Olin has no current or past corporate relationship with any of the past owners of the 51 Eames Street Property (see Attachment A - "Prior Owners of 51 Eames Street Site") and Olin is not responsible for the activities of any of the past property owners. The information on past owners of the property has been provided to USEPA in previous information request responses.

OLIN CORPORATION



SDMS DocID 559941

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If USEPA has any additional information of Olin's involvement at the Site, please provide it to us for our continued review and consideration.

Sincerely,

OLIN CORPORATION

A handwritten signature in black ink, appearing to read "Curt M. Richards". The signature is fluid and cursive, with the first name "Curt" being the most prominent.

Curt M. Richards

Prior Owners of 51 Eames Street Site

1953-1964

Operations were commenced at the site in 1953 by National Polychemicals, Inc. ("NPI"). NPI operated the site as a separate corporation until 1959 when it became a wholly-owned subsidiary of American Biltrite Rubber Company ("ABR"). Prior to selling the property in 1964, ABR assumed the liabilities of NPI. The successors to ABR are:

American Biltrite, Inc.
57 River Street
Wellesley Hills, MA 02181-2097

The Biltrite Corporation
Two University Office Park
51 Sawyer Road
Waltham, MA 02454-9045

1964-1968

Fisons Ltd. ("Fisons") acquired NPI from ABR in 1964 and ran it first as a subsidiary, until 1966, and then as a subsidiary of a subsidiary, until 1968. During this period, another subsidiary of Fisons, Patco Products, Inc. ("Patco") constructed and operated a manufacturing facility for lawn fertilizer at the Wilmington site. The successors to Fisons/Patco are:

Nor-Am Argo, LLC
340 Changebridge Road
Montville, NJ 07045-1000

Rhone-Poulenc Rorer Limited¹
RPR House, 50 Kings Hill Avenue
Kings Hill, West Malling
Kent, ME19 4TA, England

¹ Although Rhone-Poulenc acquired Fisons in 1995, it is not clear whether this company is the present successor to the liabilities associated with the 51 Eames Street site, due to a number of intervening and subsequent corporate transformations and acquisitions/sales. Additional information will be provided if it becomes known to Olin.

1968-1980

Stepan Chemical Company ("Stepan") purchased NPI in 1968, operating the facility first as a subsidiary and in 1971 merging NPI into Stepan. Stepan sold the property to Olin in 1980. The successor to Stepan Chemical Company is:

Stepan Company
22 W. Frontage Road
Northfield, IL 60093

Other than as the most recent owner in the chain of ownership of the Wilmington Site, Olin has no relationship with any of the companies discussed above.

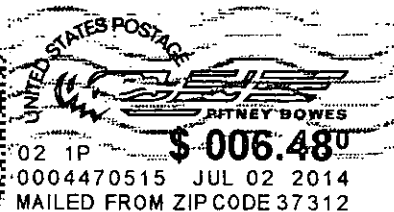


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